

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RAVIT PAB, §
§
Plaintiff, §
§
v. § CASE NO. 3:19-cv-1480
§
CHANVEASNA SOM and DANY OUN
SOM, §
§
Defendants. §

JOINT MOTION TO DISMISS WITH PREJUDICE

Ravit “David” Pab (hereinafter referred to as “Plaintiff”) and Chanveasna Som and Dany Oun Som (hereinafter jointly referred to as “Defendants”) (collectively, the “Parties”) file this Joint Motion to Dismiss with Prejudice. In support thereof, the Parties respectfully show the Court as follows:

1. The Parties have reached a settlement of all claims, defenses, and disputes between them in this case.
2. Accordingly, the parties respectfully request that this Court dismiss all claims filed in this cause against Defendants by Plaintiff with prejudice to their being refiled.
3. The Parties agree to each bear their own attorney’s fees, costs, and other expenses incurred in the lawsuit except as otherwise agreed to in writing among the parties.

WHEREFORE, the Parties respectfully pray that the Court dismiss the case with prejudice to being refiled, with each Party to bear its own costs and attorney’s fees.

Respectfully submitted,

/s/ Reema Ali
Reema Ali
Texas State Bar No. 24105327
rali@equaljusticecenter.org

Equal Justice Center
1250 W. Mockingbird Ln., Ste. 455
Dallas, Texas 75247
Tel (469) 228-4234
Fax (469) 941-0861

Christopher J. Willett
Texas State Bar No. 24061895
cwillett@equaljusticecenter.org
Rebecca Eisenbrey
Texas State Bar No. 24097646
reisenbrey@equaljusticecenter.org
Equal Justice Center
510 Congress Ave., Ste. 206
Austin, Texas 78704
Tel (512) 474-0007, ext. 107
Fax (512) 474-0007

COUNSEL FOR PLAINTIFF

Angel Mata
Texas State Bar No. 24063940
attorney@angelmatalaw.com
The Law Office of Angel Mata, P.C.
512 S. Fitzugh Ave.
Dallas, Texas 75223
Tel (972) 357-4956
Fax (972) 543-1715

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that on this 25th day of June, 2020, I electronically transmitted this motion to the Clerk of the Court using the ECF System for filing, which sent notification of an electronic filing to all CM/ECF participants.

/s/ Reema Ali